

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ADELINA BLANKENSHIP

Plaintiff

v.

YESENIA LASSITER

Defendant

Docket No. 1:23-cv-1328

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION TO AMEND AND STAY

Plaintiff, Adelina Blankenship, moves this court for an order granting leave to amend its Complaint. A copy of the proposed Second Amended Complaint is attached hereto as Exhibit A. As explained fully in the accompanying supporting memorandum, leave should be granted because it is in the interest of justice and because the proposed amendment will not prejudice Defendant.

Dated: January 5, 2024

/s/
Keith Blankenship (VSB #70027)
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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of January 2024, I will electronically file this brief with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties of record.

/s/
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